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11 **UNITED STATES DISTRICT COURT**
 12 **CENTRAL DISTRICT OF CALIFORNIA**

13 CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 14 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 15 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 16 Plaintiffs,

vs.

17 CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 18 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 19 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 20 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 21 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 22 AMIT BHALLA, an individual;
 NEWTVPAD LTD. COMPANY d/b/a
 23 NEWTVPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 24 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 25 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 26 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 27 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

28 Defendants.

) Case No. **CV 15-1869**

) **PLAINTIFFS' NOTICE OF**
) **RELATED CASE**

) **[L.R. 83-1.3.1]**

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

Please take notice that the instant action, *China Central Television, et al. v. Create New Technology (HK) Limited, et al.* may be related to the following action: *Munhwa Broadcasting Corp., et al. v. Create New Technology (HK) Co., Ltd., et al.*, Case No. CV 14-4213 RGK (RZX) (the “*Munhwa Broadcasting*” case).

The earliest-filed case is the *Munhwa Broadcasting* case, which was filed on June 2, 2014 and is now pending before the Honorable R. Gary Klausner in Courtroom 850 of the United States District Court of California, Central District.

The *Munhwa Broadcasting* case and the instant case may be related for the following reasons:

(a) Three of the ten named defendants in this case were among the fourteen named defendants in the *Munhwa Broadcasting* case: Create New Technology (HK) Co. Ltd., Hua Yang International Technology Limited, and Shenzhen GreatVision Network Technology Co., Ltd.

(b) The claims in the instant case concern direct and secondary copyright infringement liability arising from unauthorized public performances in the United States of Plaintiffs’ copyrighted television programming from mainland China and Hong Kong over a pirate broadcasting network, where consumers access that network through software applications downloaded from the “TVpad Store” on the TVpad television set-top device. In the *Munhwa Broadcasting* case, plaintiffs who control copyright interests in Korean television programming have brought similar claims for copyright infringement regarding a similar pirate broadcasting network facilitated by different software applications, also downloaded from the “TVpad Store” on the TVpad television set-top box. In the instant case, Plaintiffs have also sued U.S. distributors of the TVpad device who take affirmative steps to aid, materially contribute to, promote, foster, and induce infringing public performances of Plaintiffs’ programming; the *Munhwa* plaintiffs have sued different U.S. distributors and the proprietors of establishments where Korean television

1 programming has been performed for direct and secondary copyright infringement.
2 For these reasons, the instant case may call for determination of some of the same or
3 substantially related or similar questions of law and fact.
4

5 DATED: March 13, 2015

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12 LTD.; TVB HOLDINGS (USA), INC.; AND
13 DISH NETWORK L.L.C.
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